

EXHIBIT “A”

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

THIS DOCUMENT RELATES TO:

All Cases

MDL No. 2419
Dkt. No 1:13-md-2419 (RWZ)

DECLARATION OF REBECCA CLIMER

1. My name is Rebecca Climer. I am the chief communications officer and a senior vice president of Saint Thomas Health. I am over the age of eighteen, have never been convicted of a felony or crime of moral turpitude, and if called upon could competently testify as to the following.

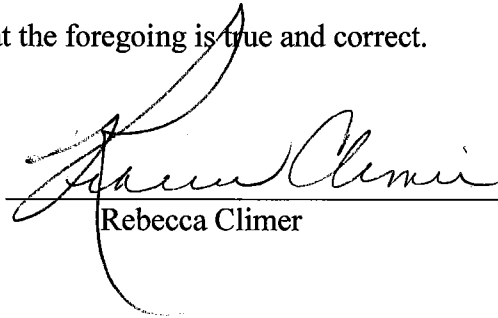
2. Saint Thomas Health has conducted various market surveys and focus groups over the years. The purpose of these surveys was to better understand public perception on various health related topics and issues, including public opinion on the reputation of Saint Thomas Health and its member hospitals compared with others. As chief communications officer, I have been personally involved in all of these projects, such as providing oversight to staff handling these projects. I typically review the results of all such surveys.

3. None of the surveys or focus groups have concerned the Saint Thomas Outpatient Neurosurgical Center ("STOPNC") or the surgical procedures it performs at issue in this litigation. None of the surveys or focus groups have asked questions regarding STOPNC or its surgical procedures. Likewise, I am unaware of any advertisement or marketing campaign ever

created or used by Saint Thomas Health, Saint Thomas Network or Saint Thomas Hospital that involved or referenced STOPNC or the surgical procedures it provides.

I declare under penalty of perjury that the foregoing is true and correct.

Dated October 5, 2015


Rebecca Climer